

Declaration of Andrea Hauser

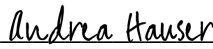
I, Andrea Hauser, pursuant to 28 U.S.C. §1746, hereby declare, under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge, information, and belief:

1. I am currently employed by Novant Health (“Novant Health”) as Vice President, Workforce Solutions. I have held this position since July 19, 2021 when I was promoted into this role. Prior to my promotion, I served as Senior Business Partner from September 2020 until my promotion, and as Business Partner from December 2010 until September 2020. I’ve been employed with Novant Health in various roles with in Human Resources/People & Culture since December 1996.
2. In my Business Partner roles, I supported the Digital Products and Services (DPS) Business Line. In August 2019, we restructured a team to move to report to Karl Hightower, Chief Data Officer/ SVP Data Products & Services. Matthias Krebs, Sr. Director Insights & Analytics, moved to report to Mr. Hightower’s team at that point.
3. Mr. Hightower reached out to me on October 25, 2019 and February 3, 2020 to have discussions about eliminating Matthias Krebs’ position, and we discussed the issue on both occasions. Relevant email correspondence with Mr. Hightower is attached as **Exhibit 1**. We were intending to make a change in early 2020, however COVID hit and we did not move forward at that time due to the organizational focus on COVID.
4. Around June 18, 2021, Denise “Kate” Forbes reached out to me to discuss resources on her team and a potential restructure. Mr. Hightower had hired Ms. Forbes to his team and he shifted Mr. Krebs to begin reporting directly to Ms. Forbes. That email correspondence with Ms. Forbes is attached as **Exhibit 2**.
5. Ms. Forbes reached out to me via email again on July 12, 2021 (Exhibit 2), and the following day, July 13, 2021, on Microsoft Teams. On July 13, 2021 Ms. Forbes and I had a zoom call to discuss the elimination of Mr. Krebs’ position, among other subjects. During that call, we discussed that Mr. Krebs was out of the office at that point and we were unsure of his exact return date, so we tabled the issue until his return.
6. On August 27, 2021, Ms. Forbes reached out to me again on Microsoft Teams letting me know Mr. Krebs had returned and reminding me that we had discussed eliminating his role and she was ready to move forward eliminating the position before September 7, 2021, when she indicated she was leaving for some planned Paid Time Off. She then reached out to me again via Microsoft Teams on August 31, 2021, requesting the name of someone she could work with to have the displacement conversation for the elimination of Mr. Krebs’ position. At that time, I provided Ms. Forbes with Letitia Smith’s name as I had recently transitioned to my current role and Letitia was now the Business Partner for Digital Products and Services. This was the end of any involvement I had with the separation of Matthias Krebs. Attached as **Exhibit 3** are my Microsoft Teams messages with Kate Forbes between July 13, 2021 and August 31, 2021.

7. At the time of providing Ms. Forbes with Letitia Smith's name, I was not aware of the Duvall lawsuit. I was also not aware of any subpoenas relating to the Duvall lawsuit, whether related to Mr. Krebs or anyone else. I also had no knowledge prior to that time of any subpoenas for Mr. Krebs or any involvement he may have in the Duvall lawsuit. I had no discussions with anyone relating in any way to Mr. Duvall or the Duvall lawsuit when working with the leaders on the termination of Mr. Krebs' employment.
8. Before or at the time I referred Ms. Forbes to Letitia Smith, I had not had any discussions with Mindy Staley at Novant or Benjamin Holland at Ogletree Deakins regarding Mr. Krebs or the Duvall lawsuit. I have only recently learned, on September 13, 2021, that the Duvall lawsuit exists and that Mr. Krebs may have been sent a subpoena related to it.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15th day of September, 2021

DocuSigned by:

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From: Hightower, Karl <[REDACTED]>
Sent: Friday, October 25, 2019 5:35 PM
To: Hauser, Andrea L <[REDACTED]>
Subject: Can we talk about moving on removing some individuals?

I want to start formally moving down the road.
Thanks Andrea!

From the mobile device of:
Karl Hightower
Chief Data Officer
SVP – Data Products and Services
Novant Health

From: Hightower, Karl <[REDACTED]>
Sent: Monday, February 3, 2020 7:35 PM
To: Hauser, Andrea L <[REDACTED]>
Subject: Re: DPS Reclassifications

We need to have another discussion on how to go about downgrading our removing people.

From the mobile device of:
Karl Hightower
Chief Data Officer
SVP – Data Products and Services
Novant Health

From: Hauser, Andrea L <[REDACTED]>
Sent: Monday, February 3, 2020 3:25:06 PM
To: Hightower, Karl <[REDACTED]>
Subject: RE: DPS Reclassifications

Thanks – her second question will be: what about Matthias? The JD title is the same for both. Although on Teams Matthias' JD is not Sr. Are you planning to downgrade his position – or should we keep both the same, but just have two different JDs?

From: Hightower, Karl <[REDACTED]>
Sent: Monday, February 3, 2020 3:05 PM
To: Hauser, Andrea L <[REDACTED]>
Subject: RE: DPS Reclassifications

No

Karl Hightower

Chief Data Officer

SVP – Data Products and Services

From: Hauser, Andrea L <[REDACTED]>
Sent: Monday, February 3, 2020 1:35 PM
To: Hightower, Karl <[REDACTED]>; Moore, Anaite <[REDACTED]>
Subject: FW: DPS Reclassifications

Hi Karl,

Please see Lisa's question below regarding the updated description you sent for Tammy.

Thanks,

Andrea

From: Kinney, Lisa A. <[REDACTED]>
Sent: Monday, February 3, 2020 1:34 PM
To: Hauser, Andrea L <[REDACTED]>
Subject: FW: DPS Reclassifications

Is this job description applicable to Matthias Krebs too?

From: Forbes, Denise K <[REDACTED]>
Sent: Monday, July 12, 2021 3:51 PM
To: Hauser, Andrea L <[REDACTED]>
Cc: Moore, Anaite <[REDACTED]>
Subject: RE: Meeting on resources

I scheduled us for a half hour tomorrow and will try to get another half hour to get through the full agenda.

From: Forbes, Denise K
Sent: Wednesday, June 23, 2021 12:53 PM
To: Hauser, Andrea L <[REDACTED]>
Subject: RE: Meeting on resources

I have not seen a response on this meeting, but wanted to send out an agenda:

1. Fred Teumer's request to promote Peter Choi to Supervisor; Priscilla Christian and Jeffery Barns to Manager
2. Tammy Wright's part time team members
3. Process for releasing FTE resource
4. Team restructure planning
5. Replacing Fred Teumer as Manager of BI Delivery/moving Fred to different role

From: Forbes, Denise K
Sent: Friday, June 18, 2021 3:57 PM
To: Moore, Anaite <[REDACTED]>
Cc: Hauser, Andrea L <[REDACTED]>
Subject: Meeting on resources

Ana, can you find Andrea and I some time next week to meet on the above subject?

D. Kate Forbes
VP, Insights & Analytics
Novant Health

